

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

LAURIE GARLAND, an individual,

Plaintiff,

v.

STATE OF OKLAHOMA EX REL.

OKLAHOMA DEPARTMENT OF

CORRECTIONS, ET AL.,

Defendants.

**Case No. CIV-20-306-RAW**

**DEFENDANTS OKLAHOMA DEPARTMENT OF CORRECTIONS,  
OKLAHOMA BOARD OF CORRECTIONS, MCCOY, LEWIS,  
MOONEYHAM AND CARLSON'S EXHIBIT LIST**

**COME NOW** Defendants Oklahoma Department of Corrections, Oklahoma Board of Corrections, Sharon McCoy, Penny Lewis, Rabekah Mooneyham and Heather Carlson, and pursuant to the Court's Scheduling Order (Doc. No. 35), submit the following Exhibit List.

No.	Document
1.	Investigation IG 19-0067 (including any referenced videos and recording)
2.	Plaintiff's field file
3.	Plaintiff's medical records
4.	Plaintiff's mental health records
5.	EWCC Inmate Handbook
6.	MBARC Orientation Manual
7.	EWCC PREA Audits
8.	DOC Policy OP-010101 (Policies and Procedures)
9.	DOC Policy OP-010301 (Management of the Oklahoma Department of Corrections)
10.	DOC Policy OP-030102 (Inmate Housing)

11.	DOC Policy OP-030117 (Correspondence, Publications, and Audio/Video Media Guidelines)
12.	DOC Policy OP-030119 (Inmate Telephone Privileges)
13.	DOC Policy OP-030120 (Inmate Property)
14.	DOC Policy OP-030601 (Oklahoma Prison Rape Elimination Act)
15.	DOC Policy OP-040101 (Facility Security Standards)
16.	DOC Policy OP-040102 (Master Roster and Post Order Guidelines)
17.	DOC Policy OP-040103 (Standards for Maintaining Logs)
18.	DOC Policy OP-040105 (Key and Lock Control Standards)
19.	DOC Policy OP-040109 (Control of Contraband and Physical Evidence)
20.	DOC Policy OP-040117 (Investigations)
21.	DOC Policy OP-040119 (Intelligence)
22.	DOC Policy OP-040204 (Segregation Measures)
23.	DOC Policy OP-060102(F) (Female Initial Custody Assessment Procedures)
24.	DOC Policy OP-060103(F) (Female Custody Assessment Procedures)
25.	DOC Policy OP-060106 (Non-Associations and Protective Measures)
26.	DOC Policy OP-060201 (Initial Reception of Inmates)
27.	DOC Policy OP-090124 (Inmate/Offender Grievance Process)
28.	DOC Policy P-100100 (Training and Staff Development Standards)
29.	DOC Policy OP-100101 (Training and Staff Development)
30.	DOC Policy OP-110215 (Rules Concerning the Individual Conduct of Employees)
31.	DOC Policy OP-140117 (Access to Health Care)
32.	DOC Policy OP-140140 (Mental Health Administration and Organization)
33.	DOC Policy OP-140201 (Mental Health Services Duties and Responsibilities)
34.	Any criminal court record or non-DOC investigation of the claims set forth in the instant action including all referenced documents, items, evidence, filings or videos
35.	Correspondence between Plaintiff and Defendant Redeagle
36.	Any audio recordings of Plaintiff
37.	Any video recordings of Plaintiff

38.	Any photographs of Plaintiff
39.	Any materials authored by, or about, Plaintiff's purported experts
All documents listed by other parties and not objected to by Defendants.	
Defendants reserve the right to supplement this list as discovery is ongoing.	

Respectfully submitted,

/s/ Kari Y. Hawkins

**KARI Y. HAWKINS, OBA #19824**

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*Attorneys for Defendants Oklahoma  
Department of Corrections, Board of  
Corrections, McCoy, Lewis, Mooneyham and  
Carlson*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 8<sup>th</sup> day of June, 2020, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of the Notice of Electronic Filing to the following ECF registrants:

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/s/Kari Y. Hawkins

Kari Y. Hawkins